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April 30, 2025

**VIA ECF**

Hon. Margaret M. Garnett  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *American Grill Investor LLC et al. v. Admiral Indem. Co.***  
**Case No.: 1:25-cv-02987 (MMG)**

Dear Judge Garnett:

This office represents Plaintiffs American Grill Investor LLC and RHS Wine LLC d/b/a The Tavern by WS (“Plaintiffs”) in the captioned matter. We write to request a short extension to May 5, 2025 to file the Rule 7.1 corporate disclosure statement. Defendant consents to this request.

As Your Honor is aware, Plaintiffs filed their complaint on April 22, 2025 after Defendant removed this matter to this Court. *See*, DE 7. On April 28, 2025, the Court directed Plaintiffs to file a corporate disclosure statement pursuant to Rule 7.1 of the Federal Rules of Civil Procedure by April 30, 2025. *See*, DE 8. Prior to filing the Complaint, and prior to the Court’s April 28<sup>th</sup> Order, our office had been collecting information to file the requisite corporate disclosure statement. Upon receipt of the Court’s April 28<sup>th</sup> Order, our office immediately consulted with the designated representative for Plaintiffs to respond to the Court’s directive. Despite our diligent efforts, the corporate structure and membership in each of the limited liability companies is quite complex and has taken longer than expected. Indeed, to comply with Rule 7.1, we need to identify the citizenship of more than 10 other limited liability companies and/or limited partnerships, and the respective members of each, which are numerous.

While we were hopeful to have it all accurately sorted by today, there are still several people and entities for which we are missing information to enable us to accurately identify their citizenship. Accordingly, we request a brief extension until May 5, 2025 to file the corporate disclosure statement. There are currently no other scheduled dates or deadlines in this matter that would be affected by this extension.

Respectfully submitted,  
Agulnick Kremin P.C.

Todd D. Kremin

Cc: All counsel via ECF

GRANTED. Plaintiffs' deadline to file a Corporate Disclosure Statement is hereby EXTENDED until **May 5, 2025**.

SO ORDERED. Dated May 1, 2025.

A handwritten signature in black ink, appearing to read "Margaret M. Garnett", is written over the printed name.

HON. MARGARET M. GARNETT  
UNITED STATES DISTRICT JUDGE